

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION

Advanced Silicon Technologies LLC,

Plaintiff,

v.

NXP Semiconductors N.V.,
NXP B.V., and
NXP USA, Inc.,

Defendants.

Case No. 6:22-cv-00466-ADA-DTG

Jury Trial Demanded

Joint Claim Construction Statement

The parties submit this Joint Claim Construction Statement for asserted U.S. Patent Nos. 7,804,435 ('435 Patent) and 8,933,945 ('945 Patent) under the Scheduling Order (ECF No. 45).

1. Agreed Constructions

The parties have met and conferred and have agreed on the following constructions:

Claim(s)	Term	Agreed Construction
'945 Patent, Claims 1, 21	"memory controller"	Plain and ordinary meaning

2. Disputed Constructions

The charts below identify each disputed claim term and in what claims it appears, followed by each party's proposed construction. Each disputed term was proposed by Defendant.

2.1. "A method for reducing power consumption for a video decoder comprising"

Claim(s)	AST's Proposal	NXP's Proposal
'435 Patent, Claim 26	Preamble is non-limiting	Preamble is limiting

2.2. "graphics pipeline"

Claim(s)	AST's Proposal	NXP's Proposal
'945 Patent, Claims 1, 4, 12, 21	Plain and ordinary meaning	"hardware, which may be one or more circuits" ¹

2.3. "graphics pipelines operative to process data in a dedicated tile"

Claim(s)	AST's Proposal	NXP's Proposal
'945 Patent, Claims 1, 21	Plain and ordinary meaning	"graphics pipeline operative such that data for a specific tile is processed by one and only one pipeline"

2.4. "a memory controller . . . operative to transfer pixel data between each of a first pipeline and a second pipeline [the two graphics pipelines] and a memory shared among the at least two graphics pipelines"

Claim(s)	AST's Proposal	NXP's Proposal
'945 Patent, Claims 1-4, 17-20	Plain and ordinary meaning	"a memory controller . . . operative to transfer pixel data to, from, and between (1) the first graphics pipeline and the second graphics pipeline, and also (2) the two graphics pipelines and a memory shared among the two graphics pipelines"

2.5. "NxM number of pixels"

Claim(s)	AST's Proposal	NXP's Proposal
'945 Patent, Claim 21	Plain and ordinary meaning	"rectangular block of pixels that is not square"

¹ NXP truncated its originally proposed construction of "hardware, which may be one or more circuits, *that processes graphics data*" in response to AST's contention that "processes graphics data" was "needless language [that] could only cause confusion in view of the full claim set." Dkt. 50 at 9. NXP is amenable to either its original construction or its narrowed proposal offered to focus the parties' dispute.

Dated: January 24, 2023

Respectfully submitted,

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Certificate of Service

I hereby certify that, on January 24, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record in the above-referenced matter.

/s/ Thomas J. Armento

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